

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

DANIEL ENRIQUE ZACARIAS MATOS,# Petitioner,	§ § § v.	§ CIVIL ACTION NO. 1:25-cv-057
FRANCISCO VENEGAS, Facility Administrator, El Valle Detention Center, etc., Respondents.	§ § §	

JOINT STATUS REPORT

TO THE HONORABLE JUDGE OF SAID COURT:

The parties submit this joint status report in compliance with the Court's Order. [ECF 23].

After the Court issued its Order on Friday, there were further developments in the *J.G.G. v. Trump* litigation that impact the timing and next steps in this case. Specifically, the government sought an administrative stay of the Temporary Restraining Order issued in *J.G.G., et al. v. Donald J. Trump, In His Capacity as President of the United States, et. al.*, No. 1:25-cv-00766 (D.D.C.) from the Supreme Court. See *Donald J. Trump, In His Capacity as President of the United States, et. al. v. J.G.G., et al.*, No. 24A931 (U.S. Mar. 28, 2025). The Supreme Court ordered that a response to the government's application is due to the Chief Justice by 10 a.m. on April 1, 2025.¹ Accordingly, the parties propose submitting a briefing and hearing schedule on Thursday, April 3, 2025. The Courts's order staying removal through April 7, 2025, will remain in place. The proposed joint status report deadline is without prejudice to either party seeking to restart briefing if it determines that more immediate relief is necessary.

¹ The proceedings are listed on the Supreme Court's website available at:
<https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/24a931.html>.

Respondents complied, and continue to comply, with this Court's Order enjoining them from removing Petitioner from the country.

The Petitioner is in no immediate danger of deportation or removal because (1) the District Court for the District of Columbia's order as to class certification, which Respondents agree that Petitioner is a member, and the TRO enjoins Respondents from acting to remove Petitioner from the country on AEA grounds, and (2) there are no other orders pending subjecting Petitioner to removal under Title 8.

Given that this Petitioner is in no immediate danger of deportation or removal, and that he is a member of a class for which related, and relevant, litigation in another circuit is ongoing, the parties respectfully that the parties be permitted to submit a joint briefing schedule on Thursday, April 3, 2025.

Dated: March 31, 2025

Jones and Crane

/s/ Jaime Diez

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on March 27, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sends notice of electronic filing to all counsel of record.

/s/ Devin L. Barrett _____
DEVIN L. BARRETT
Trial Attorney